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Attorneys for
FIRST SOLAR, INC.,
WILLOW SPRINGS SOLAR 3 LLC,
AND MOJAVE SOLAR, LLC

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case

No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER TO NEXTERA'S MOTION
FOR LIMITED RELIEF FROM STAY
TO PARTICIPATE IN APPELLATE
PROCEEDINGS WITH RESPECT TO
FERC ORDERS**

Date: June 26, 2019

Time: 9:30 a.m. (PST)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: June 21, 2019
4:00 p.m. (PST)

**JOINDER OF ADDITIONAL PPA
COUNTERPARTIES IN NEXTERA'S MOTION
FOR LIMITED RELIEF FROM STAY TO
PARTICIPATE IN APPELLATE PROCEEDINGS WITH
RESPECT TO FERC ORDERS**

CASE No: 19-30088 (DM)

1 First Solar, Inc., Mojave Solar LLC, and Willow Springs Solar 3, LLC (collectively, the
2 “**Additional PPA Counterparties**”) hereby join (the “**Joinder**”) in the motion [of NextEra
3 Energy, Inc. and NextEra Energy Partners, L.P. (collectively, “**NextEra**”) and the Memorandum of
4 Points and Authorities [Docket No. 2400] filed in support thereof (collectively, the “**NextEra Lift**
5 **Stay Motion**”), to lift the automatic stay (to the extent necessary) in the Bankruptcy Court for the
6 Northern District of California (the “**Bankruptcy Court**”).

7 Each of the Additional PPA Counterparties have been granted leave to intervene in the
8 Adversary Proceeding¹ and for the reasons set forth in the NextEra Lift Stay Motion, the
9 Additional PPA Counterparties respectfully request that the Court enter an order (i) lifting the
10 automatic stay to the extent necessary to permit the Additional PPA Counterparties to (a) seek
11 leave from the applicable circuit court of appeals to intervene in any appeal of the FERC Orders (as
12 defined in the NextEra Lift Stay Motion); (b) to the extent permitted by the applicable circuit court
13 of appeals, participate in and prosecute to conclusion any appeal of the FERC Orders; (c) seek or
14 oppose any request for rehearing, rehearing en banc, petition for writ of certiorari; (d) participate in
15 the briefing and argument relating to any and all the foregoing; and (e) participate in any
16 proceedings on remand of the FERC Orders; (ii) lifting the automatic stay to the extent necessary
17 to generally allow all courts and administrative agencies with jurisdiction over the appeal or
18 remand to enter final orders relating thereto; and (iii) granting such other and further relief as is just
19 and proper.

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26 ¹ See *In re PG&E Corp. et al., PG&E Corp. et al. v. Fed. Energy Reg. Comm.*, Adv. No. 19-03003 (DM) (Bankr. N.D.
27 Cal.), Adv. Docket Nos. 89 and 90.

NOTICE

Notice of this Joinder will be provided to (i) the Office of the U.S. Trustee for Region 17 (Attn: Anthony R. Vara, Esq. and Timothy Laffredi, Esq.); (ii) counsel to the Debtors; (iii) counsel to the Creditors Committee; (iv) counsel to the Tort Claimants Committee; (v) the Securities and Exchange Commission; (vi) the Internal Revenue Service; (vii) the Office of the California Attorney General; (viii) the California Public Utilities Commission; (ix) the Nuclear Regulatory Commission; (x) the Federal Energy Regulatory Commission; (xi) the Office of the United States Attorney for the Northern District of California; (xii) counsel for the agent under the Debtors' debtor-in-possession financing facility; (xiii) counsel to the PPA Counterparties; and (xiv) those persons who have formally appeared in these chapter 11 cases and requested service pursuant to Bankruptcy Rule 2002.

The Additional PPA Counterparties respectfully submit that no further notice is required.

DATED: June 7, 2019

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

By: /s/ Amy S. Park

Amy S. Park
Attorneys for
FIRST SOLAR, INC.
WILLOW SPRINGS SOLAR 3, LLC AND
MOJAVE SOLAR LLC